

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

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|                             |   |                                    |
|-----------------------------|---|------------------------------------|
| iROBOT CORPORATION,         | ) |                                    |
|                             | ) |                                    |
| Plaintiff,                  | ) |                                    |
| v.                          | ) | Civil Action No. 1:19-cv-12125-ADB |
|                             | ) |                                    |
| SHARKNINJA OPERATING, LLC,  | ) |                                    |
| SHARKNINJA MANAGEMENT, LLC, | ) |                                    |
| SHARKNINJA SALES COMPANY,   | ) |                                    |
| Defendants.                 | ) |                                    |
|                             | ) |                                    |

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**UNOPPOSED MOTION FOR PARTIAL DISMISSAL**

Plaintiff iRobot Corporation (“iRobot”) moves pursuant to Fed. R. Civ. P. 41(a) to dismiss iRobot’s claims in the above-captioned action under United States Patent No. 9,921,586 (“the ‘586 Patent”) with prejudice. iRobot premises its motion on the following:

1.       Shark’s representation that the accused Shark IQ Robot vacuum cleaners, and their associated applications, do not allow a user to select a room or limited set of rooms in a home and schedule to clean that room or set of rooms at a future time.
2.       Nothing herein limits iRobot’s ability to re-assert the ’586 patent against a Shark robotic vacuum cleaner product that offers that functionality or otherwise reveals that functionality, is updated to enable that functionality, or is a derivative of a current Shark IQ Robot vacuum cleaner with modifications material to infringement of the ’586 patent.
3.       Nothing herein is intended to limit the still-pending claims and counterclaims in the above-captioned action.

Respectfully submitted,

**iROBOT CORPORATION**

*/s/ Timothy H. Madden*

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SO ORDERED this \_\_\_\_\_ day of December, 2019.

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**LOCAL RULE 7.1 CERTIFICATION**

Pursuant to Local Rule 7.1(a)(2), the undersigned has conferred with counsel for Shark, and Shark consents to this motion.

*/s/ Timothy H. Madden*  
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Timothy H. Madden

**CERTIFICATE OF SERVICE**

This document was filed through the CM/ECF system and will be served on SharkNinja pursuant to Fed. R. Civ. P. and L.R. 5.2.

*/s/ Timothy H. Madden*  
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Timothy H. Madden